

**CERTIFICATE OF COMPLIANCE**

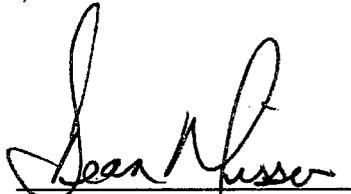
Case No. 20-291

Caption: *Jamell Birt v. United States*

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,998 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 5, 2020



Dean Misser  
*Record Press, Inc.*

Sworn to before me on

October 5, 2020

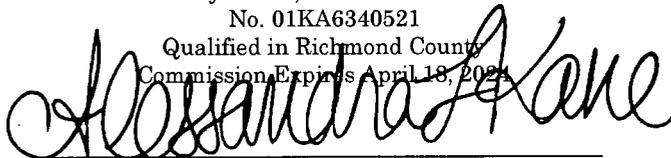
ALESSANDRA KANE

Notary Public, State of New York

No. 01KA6340521

Qualified in Richmond County

Commission Expires April 18, 2024



Notary Public